



POLICY

on

Personal Information Protection & Electronic Documents Act (PIPEDA)

Regulation

As of January 1, 2004, the federal government is enforcing the PIPEDA (Personal Information Protection & Electronic Documents Act). The Act regulates the collection, use and disclosure of personal information.

Ontario Water Polo Association, in essence, is asking its members to allow personal information such as name, address, date of birth, e-mail addresses, telephone numbers, etc., on their families to be entered electronically on a nation-wide database. Hard copy lists are also on file at the Ontario Water Polo office. The lists are kept in a secure location to which no one other than the Ontario Water Polo staff has access. The Program Administrator is the appointed designate for overseeing the data collection process and is ultimately accountable for compliance with this policy.

Purpose of Information Collection

This information is necessary to allow our athletes to train and compete in an age appropriate environment, and to have personal information on hand when direct contact is necessary. The latter also applies to volunteers, officials and coaches.

Security & Safeguards

The Water Polo Canada database, which is managed by 'OTTAWA ONLINE' is secure, and personal information is not accessible to the general public (see Appendix A for security features). Each club's registrar has access to the database only as it pertains to club members. Ontario Water Polo, as the parent organization, can access personal information on all its registered members. The Ontario Water Polo Association and Water Polo Canada uses the database to determine total registration numbers for reports to our governing bodies (e.g. The Ontario Ministry of tourism and Recreation). Passwords are mandatory for all identified groups to access required information.

Limited Use of Information

Personal information is not divulged to anyone without prior permission from the family. Occasionally, Ontario Water Polo provides family mailing addresses only to a bonded mailing house for the purpose of distributing specific information directly to athletes' homes. Ontario Water Polo and Water Polo Canada also accesses the information for statistical and tracking purposes of membership as well as for tournament/game results and statistics.



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Limited Use of Information (continued)

Tournament Directors need name and date of birth (DOB) for athletes entering competitions. Names, ages, and event results are published electronically as well as in hard copy format after the conclusion of competitions. Other personal information is not made available at any time without prior contact with the coach or the parents/guardians of under-aged athletes.

Consent & Withdrawal Thereof

Ontario Water Polo requires consent from each family to continue with this practice. Each club registrar should keep a signed consent form (see attached) on file for each registered member (athletes, volunteers, coaches, etc.) until such time at which a member wishes to withdraw consent or leaves the organization. **Withdrawal of consent for the use of personal information must be received immediately in writing by the Program Administrator of Ontario Water Polo.**

Personal information is kept on file for the duration of a member's participation in Ontario Water Polo programmes. At the end of each season (August 31), the data is archived and will only be re-activated for those members who re-register with the association.

Individual Access

Ontario Water Polo will be happy to provide registered individuals with personal data as it appears on the 'OTTAWA ONLINE' database within 30 days of receipt of a written request.

Complaints

Complaints are to be directed to the current **SECRETARY** of the Ontario Water Polo Association who will attempt to remedy each situation as it arises expeditiously and in strict confidence.

SECURITY OF DATA

(as per Mike O'Brien, Water Polo Canada Database builder)

- * All access to the website is controlled by a security model. Every page in the site is validated separately, ensuring no side door hacking can occur.
- * The Provincial organization, such as OWPA in Ontario, can choose to grant clubs access or not. A club's access can be removed or disabled at any time by the PSO.
- * Water Polo Canada can remove any user in the system at any time.
- * Club users cannot see personal details of anyone outside their own club.
- * No credit card numbers will ever be stored in the database
- * Website encryption will be not be required, since a third party vendor will be used for financial transactions.
- * Ottawa online manages the site. As a professional ISP, they make their business staying on top of security measures not just at the time of this writing, but in the future. The site is built upon industry leading Microsoft Server technology, including all latest security patches, which will be updated on the server as they become available from Microsoft.
- * The database server on which the data resides, has no external (internet/web) exposure. It is not visible to the outside world and is only accessed via an internal onsite LAN or from the web/appserver. The IP associated with this server is within the range of private IP's – not addressable outside an internal LAN.

Mike O'Brien

Personal Information Protection & Electronic Documents Act

CONSENT FORM

Ontario Water Polo's policy with regard to the PIPEDA is attached. Please read it and sign the consent area of this form.

I, _____, give permission to the Triggerfish Water Polo Club to enter required personal information on the Water Polo Canada database, which is managed by 'OTTAWA ONLINE' database for the purposes outlined in Ontario Water Polo's policy, which I have read. I understand that I may withdraw consent at any time upon written notice to the Ontario Water Polo Program Administrator, and my personal information will be purged from the database. Withdrawal constitutes de-registration. The club will be informed immediately upon receipt of the written notice.

NAME _____ **Day Time telephone** (_____) _____
(please PRINT)

e-mail Address _____